

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

---

**JOSEPH SIMMONS,**

**Plaintiff,**

**v.**

**Civil Action  
No. 22-1644-JMG**

**CITY OF PHILADELPHIA, et al.,  
Defendants.**

---

**NOTICE OF ACCEPTANCE OF JUDGEMENT**

TO: Derek Kane, Esq.  
Emily M. Hoff, Esq.  
City of Philadelphia Law Department  
1515 Arch Street, 14<sup>th</sup> Floor  
Philadelphia, PA 19102  
Derek.kane@phila.gov  
Emily.hoff@phila.gov

Pursuant to Federal Rule of Civil Procedure 68, Plaintiff Joseph Simmons hereby accepts judgment to be entered against the City of Philadelphia for all claims for damages, costs, attorneys' fees and interest accrued to date in the amount of One-Hundred and Fifty Thousand Dollars (\$150,000.00).

Respectfully submitted,

/s/ John J. Coyle  
John J. Coyle, Esq.  
MCELDREW PURTELL  
123 South Broad Street  
Suite 2250  
Philadelphia, PA 19109  
215-545-8800  
jcoyle@mceldrewpurtell.com

Nia Holston, Esq.  
ABOLITIONIST LAW CENTER  
P.O. Box 23032  
Pittsburgh, PA 15222  
nia@alcenter.org

Date: April 14, 2025

**CERTIFICATE OF SERVICE**

I certify that the forgoing Notice of Acceptance of Judgement was served upon all defendants via electronic mail to counsel of record listed in the Notice.

/s/ John J. Coyle